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15 **UNITED STATES DISTRICT COURT**
16 **DISTRICT OF NEVADA**

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18 ELENA JULL, and DERRICK JULL,

19 Plaintiffs,

20 v.

21 VALLEY HEALTH SYSTEM LLC;
22 CENTENNIAL HILLS HOSPITAL MEDICAL
23 CENTER; and SUMMERLIN HOSPITAL
24 MEDICAL CENTER;

25 Defendants.
26 -----

Case No. 2:21-cv-01353-GMN-BNW

**JOINT DISCOVERY PLAN AND
SCHEDULING ORDER**

**SPECIAL SCHEDULING REVIEW
REQUESTED**

27 Plaintiffs Derrick and Elena Jull (“Plaintiffs”) and Defendants Valley Health System LLC,
28 Centennial Hills Hospital Medical Center, and Summerlin Hospital Medical Center (Valley, Centennial,
and Summerlin collectively “Defendants”), by and through their respective counsel, pursuant to Rule
26(f)(2) of the Federal Rules of Civil Procedure and Local Rule 26-1(b) of the United States District Court
for the District of Nevada, hereby submit their proposed Joint Discovery Plan and Scheduling Order:

- (1) **Request for Special Scheduling Review.** Upon discussing the case per Rule 26, counsel for the parties have jointly identified the potential for over 30 witnesses as well as the potential for a substantial body of discoverable evidence given that one of the Plaintiffs was a medical patient at two hospital facilities for at least several weeks, with the nature of the medical services provided to her posing a central issue to the case. Given the anticipation for substantial discovery, the parties request a year for discovery from the filing of the Answer.
- (2) **Discovery Cut-Off Date.** The cut-off date for discovery shall be August 17, 2022, 365 days from the first defendant's Answer in this case on August 17, 2021.
- (3) **Amending the Pleadings and Adding Parties.** All motions to amend the pleadings or to add parties shall be filed no later than May 13, 2022, 90 days before the close of discovery.
- (4) **Fed. R. Civ. P. 26(a)(2) Disclosures (Experts).** Expert disclosures shall be made by June 13, 2022, 59 days before the discovery cut-off date, and rebuttal-expert disclosures shall be made by July 12, 2022, 30 days after the initial disclosure of experts.
- (5) **Dispositive Motions.** The deadline for filing dispositive motions is September 16, 2022, 30 days after the discovery cut-off date.
- (6) **Pretrial Order.** The deadline for the joint pretrial order is October 17, 2022, 31 days after the dispositive-motion deadline.
- (7) **Fed. R. Civ. P. 26(a)(3) Disclosures.** The disclosures required by Fed. R. Civ. P. 26(a)(3) and any objections to them shall be included in the joint pretrial order.
- (8) **Alternative Dispute Resolution.** The parties certify that they met and conferred about the possibility of using alternative dispute-resolution processes on September 28, 2021;
- (9) **Alternative Forms of Case Disposition.** The parties certify that they considered consent to trial by a magistrate judge under 28 U.S.C. § 636(c) and Fed. R. Civ. P. 73 and the use of the

Short Trial Program (General Order 2013-01) on September 28, 2021.

- (10) **Electronic Evidence.** The parties certify that they have considered whether to present evidence in electronic format to jurors for the purposes of jury deliberations on September 28, 2021 and have stipulated to jointly submit any such evidence in an electronic format compatible with the court's electronic jury evidence display system.

Dated: October 1, 2021



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Order

IT IS ORDERED that ECF No. 21 is DENIED. The Court does not find good cause for such a lengthy period of discovery. IT IS FURTHER ORDERED that the parties shall have the standard discovery plan and scheduling order starting from October 4, 2021. The parties may request discovery extensions, if necessary.

IT IS SO ORDERED

DATED: 5:15 pm, October 04, 2021



BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE